

From: Cote, Mike - Middlebury, CT
Sent: Friday, October 21, 2005 4:08 PM
To: Michael Odonnell (E-mail); Tom Biksey (E-mail)
Subject: Environ Correspondence re Sistersville Workplan

Hello Mike

We have received and reviewed both the 9/27/05 Environ letter regarding "PCB Characterization at Sistersville, WV Facility" and the 9/27/05 Environ Memorandum "PCB Characterization, August 2005". Thank you for providing them.

I'd like to make a few comments relative to each.

A. 9/27/05 Environ Memorandum "PCB Characterization, August 2005"

1. This memo describes the activities and findings of additional soil characterization activities conducted by Environ in early August of 2005. In the first paragraph of the Background section of this memo, Environ states that the previous plant owner retained the existing environmental liabilities at the facility. We take exception to this statement as it is an oversimplification of the agreement between us, which speaks for itself.
2. It is good to see that the sampled landfill cover material all had levels below the low-occupancy clean-up standard of 25 ppm, and that the "excavation" samples yielded only two remaining locations in excess of 25 ppm (E-7, [3.5' - 4' b.g.] @ ~42 ppm and E-13 [0.5' - 1.0' b.g.] @ 92.7 ppm). As noted in your report, E-13 was not located within the footprint of the excavation, but was located immediately northeast of the excavation near the former SB67 sampling location. E-12, which was noted at the former SB67, did not have detectable concentration of PCBs.

Also, the table lists E14 & E15, but these samples are not shown on the figure. Where were these samples collected?

3. The memo does not describe the current status of the excavation. Has it been backfilled yet and can Environ precisely reproduce their sampling locations for us? What was the source of the backfill for the excavation, and was it analytically tested before use as backfill?
4. The photographs provided with this memo point out the number of underground utilities located in the subject area. In the workplan submitted to GE, we've requested confirmation of the accuracy and adequacy of the site utility mapping reproduced from utility maps provided by GE (please recall that a few evident question were raised, particularly relative to inconsistencies between underground utility maps). Has GE confirmed that the utility locations are correct as presented in the workplan?

B. Letter regarding "PCB Characterization at Sistersville, WV Facility", dated 9/27/05

1. This letter describes Environ's suggestions relative to our "PCB Characterization Workplan" dated July 12, 2005. In general, it appears that their comments are exclusive of the findings from their additional site characterization described above, as they were not able to confirm levels similar to those previously identified.

As the August 2005 Environ samples appear to represent the current characteristics of the area, we will revise our Workplan appropriately within the next two weeks and submit it for your comment. We continue to desire to implement the work quickly. Some specifics follow.

2. Environ has recommended that the soil sampling interval be 0 - 12 inches below grade, primarily due to possible result interference due to extraneous surface materials. Our selection of the shallow 0 - 3" interval was selected based on Subpart N, 761.286 of the Mega Rule. By way of clarification, it is our intent to sample the first three inches of undisturbed material at each location based upon field observations. To augment our sample collection/analysis program, we will modify the Workplan to include the collection and analysis of an additional soil sample from the next 18" soil horizon directly below each shallow sample.

3. Regarding Environ's comment about marking/recording the sample locations in order to be able to reproduce them for future evaluation, I would note that this has always been our intent and is a standard part of good field environmental investigation practice.
4. Regarding possible deeper sampling intervals and/or expanding the sampling grids horizontally, it is our intent to use the initial round of sample results to guide possible future efforts to collect additional samples if any are required.
5. As the samples in the Praxair Unit exhibited concentrations below the 25 ppm level for low occupancy areas, it is not our intent to sample in this area, nor is it our intent to sample groundwater monitoring wells.
6. Relative to utility clearances, the plan discussed with GE included the initial mark-out of our sampling points on-site based upon the existing utility mapping to be verified by GE, and subsequent review & approval of the locations by GE prior to sampling. The utility clearance procedure will be specified in greater detail in the revised workplan.

I will be back in the office on November 1st, but will be checking my voicemail as possible between now and then (I won't have email access). Please let me know if you have any comments or questions. Thanks.

Mike

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